



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Shoshone-Eureka Resource Area

P.O. Box 1420

Battle Mountain, NV 89810



RECEIVED

APR 12 1989

ENVIRONMENTAL
PROTECTION

IN REPLY REFER TO

N-41970

1703/2710

(NV-063.1)

Lander County Commissioners
Attn: Tom Beebe, County Road Supervisor
P.O. Box 1655
Battle Mountain, Nevada 89820

Dear Mr. Beebe:

Enclosed is a copy of the Site Inspection Report for the Antelope Valley Pesticide Container Disposal Site which you requested during our field visit on March 28.

At the meeting you requested that we contact The Nevada Department of Environmental Protection (NDEP) for information regarding disposal of the glass jars identified by Weston as containing or having contained a chemical named Dibrom 8 Spray. Also, you requested information as to what will be required to comply with the recommendations of the BLM's Nevada State Office in order to finalize the sale. Byard Kershaw contacted John West with NDEP, and he indicated that they would need a Clean-up Plan as required by The Solid Waste Disposal Act, as amended by The Resource Conservation and Recovery Act (RCRA) as amended, by the regulations contained in Title 40 Code of Federal Regulations Parts 264 and 265, and the appropriate Nevada Revised Statutes and Nevada Administrative Code. Mr. West also suggested that Byard contact U.S. Ecology (USE), which operates a solid hazardous waste disposal site south of Beatty, Nevada, concerning the disposal of the containers.

Contacts were made with several USE employees regarding Dibrom 8, and an acceptable method of disposing of the jars. The chemical name for Dibrom 8 is, 1,2-Dibromo-2,2-Dichloroethyl Dimethyl Phosphate. It is an insecticide for flies and mosquitos and if packaged properly is suitable for disposal at the Beatty site. USE provides services to dispose of the material by the proper methods. The method of disposal would be to use 55 gallon or appropriate sized drums containing a non-biodegradable absorbent material (bentonite clay or similar material) in sufficient quantities to prevent leakage of any liquid which may be in the jars. Absorbent would be placed in the bottom of the drum, the jars would be broken inside the drums, and absorbent placed on top of the broken jars. The drums must be 90% full after settling. Their sales representative provided the following figures for the service. The storage fee for the material is \$5.00 per cubic foot, and a 55 gallon drum is 7.5 cubic feet. Based on an estimate of 20 jars at the site, three to four drums may be needed to contain the jars. The transportation cost is \$3.00 per loaded mile, and labor cost is \$35.00 per man hour. It is estimated that the job will require two men three to eight hours to complete packaging. Enclosed is an information packet from USE describing some of their methods and forms for requesting disposal of materials at their site. Listed below are the names of persons with USE which were contacted to obtain the information.

Bob Marchand, Manager of disposal site, Beatty, Nevada
(702) 553-2203

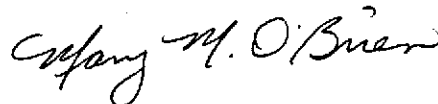
Mike Green or
Marlene Pardee, Louisville, Kentucky
(800) 626-5317 or
(502) 426-7160

Mitch Carter, Sales Representative, Las Vegas, Nevada
(702) 646-0611

Byard has tentatively scheduled a meeting with John West to meet at the Antelope Valley site at 1:00 PM on April 18. Bob Wilson from the BLM Nevada State Office, and Carol Kershaw from the Battle Mountain BLM are also expected to attend. If you or any other County representatives would like to attend, contact Byard on April 17 to confirm the schedule.

If we can be of further assistance, contact Carol or Byard Kershaw.

Sincerely,



Mary M. O'Brien
Area Manager

Enclosures
As stated

cc: John West, NDEP

State Director, (NV-920)